



February 15, 2017

**Via Electronic Submission**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW, Room TW-A325  
Washington, DC 20554

**Re: Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 09-197  
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42  
Connect America Fund, WC Docket No. 10-90**

Dear Ms. Dortch:

On February 14, 2017, Charles McKee and I of Sprint Corporation ("Sprint") met with Jodie Griffin, Garnet Hanly, and Rashann Duvall of the Wireline Competition Bureau to discuss minimum performance standards for Lifeline mobile broadband internet access service (BIAS). Sprint requested expeditious clarification of two aspects of Section 54.408(b)(2):

- That WiFi service does not satisfy the current 500MB mandated Lifeline mobile broadband data allotment requirement. Sprint explained that WiFi does not provide broadband service in locations (such as a Lifeline customer's home) that otherwise lacks broadband access, and that allowing WiFi to count towards data allotments makes the escalating data allotment standards meaningless.
- That Lifeline broadband customers who do not have a 3G-capable and configured device are not receiving the benefits of mobile broadband service and should accordingly not be considered BIAS customers subject to the 12-month port freeze.

The Commission should also set out steps to address those Lifeline subscribers who have been incorrectly classified as broadband customers based on misinterpretation or misapplication of the minimum service standard rule. Impacted service providers should be required to identify their affected subscribers and notify them of the correction being made, and NLAD must be updated to reflect the correct port freeze status of affected end users.

Pursuant to Section 1.1206 of the Commission's Rules, a copy of this letter is being filed electronically in the above-referenced dockets. If you have any questions, please feel free to contact me at (703) 433-4503.

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Sincerely,

*/s/ Norina T. Moy*

Norina T. Moy  
Director, Government Affairs

c: Jodie Griffin  
Garnet Hanly  
Rashann Duvall